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## 1611-CC00501 - CONNECTOR CASTINGS V INDUSTRIAL AIR PURIFI ET A (E-CASE)

<a href="#">Case Header</a>	<a href="#">Parties &amp; Attorneys</a>	<a href="#">Docket Entries</a>	<a href="#">Charges, Judgments &amp; Sentences</a>	<a href="#">Service Information</a>	<a href="#">Filings Due</a>	<a href="#">Scheduled Hearings &amp; Trials</a>	<a href="#">Civil Judgments</a>	<a href="#">Garnishments/ Execution</a>
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- 10/18/2016**      **Cert Serv Req Prod Docs Things**  
Certificate of Service Plt s First Interrogatories and First Requests for Production of Documents to Dfts Industrial Air Purification Inc and to Donald Campbell; Electronic Filing Certificate of Service.  
**Filed By:** RONALD JAY EISENBERG  
**On Behalf Of:** CONNECTOR CASTINGS INC
- 10/17/2016**      **Notice of Service**  
Return of Service of Summons Served upon Donald Campbell; Electronic Filing Certificate of Service.  
**Filed By:** RONALD JAY EISENBERG  
**On Behalf Of:** CONNECTOR CASTINGS INC
- Notice of Service**  
Return of Service of Summons Served upon Industrial Air Purification Inc; Electronic Filing Certificate of Service.  
**Filed By:** RONALD JAY EISENBERG
- Summons Personally Served**  
Document ID - 16-SMOS-232; Served To - CAMPBELL, DONALD; Server - ; Served Date - 17-OCT-16; Served Time - 08:47:00; Service Type - Special Process Server; Reason Description - Served
- Summons Personally Served**  
Document ID - 16-SMOS-231; Served To - INDUSTRIAL AIR PURIFICATION INC; Server - ; Served Date - 17-OCT-16; Served Time - 08:59:00; Service Type - Special Process Server; Reason Description - Served
- 10/14/2016**      **Order - Special Process Server**  
ERIC ERGER APPOINTED SPECIAL PROCESS SERVER, FILED. CT
- Alias Summons Issued**  
Document ID: 16-SMOS-232, for CAMPBELL, DONALD.SUMMONS SAVED AND ATTACHED IN PDF FORM FOR ATTORNEY TO RETRIEVE FROM SECURE CASE.NET. CT
- Alias Summons Issued**  
Document ID: 16-SMOS-231, for INDUSTRIAL AIR PURIFICATION INC.SUMMONS SAVED AND ATTACHED IN PDF FORM FOR ATTORNEY TO RETRIEVE FROM SECURE CASE.NET. CT
- 10/13/2016**      **Alias Summons Requested**  
Request for Alias Summonses for Industrial Air Purification Inc and Donald Campbell; Electronic Filing Certificate of Service.  
**Filed By:** RONALD JAY EISENBERG  
**On Behalf Of:** CONNECTOR CASTINGS INC
- Motion Special Process Server**  
Motion for Appointment of Special Process Server; Electronic Filing Certificate of Service.  
**Filed By:** RONALD JAY EISENBERG
- 08/29/2016**      **Notice of Service**  
Non est return of service of Summons for Industrial Air Purification; Electronic Filing Certificate of Service.  
**Filed By:** RONALD JAY EISENBERG

**EXHIBIT A**

**On Behalf Of:** CONNECTOR CASTINGS INC

**Notice of Service**

Non est return of service of Summons for Donald Campbell; Electronic Filing Certificate of Service.

**Filed By:** RONALD JAY EISENBERG

**Summons Returned Non-Est**

Document ID - 16-SMOS-122; Served To - INDUSTRIAL AIR PURIFICATION INC; Server - ; Served Date - 24-AUG-16; Served Time - 00:00:00; Service Type - Sheriff Department; Reason Description - Non-est; Service Text - WENT TO RESIDENCE 5 TIMES, UNABLE TO MAKE CONTACT

**Summons Returned Non-Est**

Document ID - 16-SMOS-123; Served To - CAMPBELL, DONALD; Server - ; Served Date - 24-AUG-16; Served Time - 00:00:00; Service Type - Sheriff Department; Reason Description - Non-est; Service Text - NOT ABLE TO MAKE CONTACT WITH SUBJECT, WENT TO RESIDENCE 5 TIMES

06/10/2016

**Order**

PLAINTIFFS MOTION FOR EXTENSION OF TIME TO SERVE DEFENDANTS GRANTED TH. DLC

**Associated Entries:** 06/06/2016 - Motion for Extension of Time ±

06/06/2016

**Note to Clerk eFiling**

**Filed By:** RONALD JAY EISENBERG

**Motion for Extension of Time**

Plt s Motion for Extension of Time to Serve Defendants; Electronic Filing Certificate of Service.

**Filed By:** RONALD JAY EISENBERG

**On Behalf Of:** CONNECTOR CASTINGS INC

**Associated Entries:** 06/10/2016 - Order ±

**Summons Issued-Circuit**

Document ID: 16-SMOS-123, for CAMPBELL, DONALD. SUMMONS SAVED AND ATTACHED IN PDF FORM FOR ATTORNEY TO RETRIEVE FROM SECURE CASE.NET. CLM

**Summons Issued-Circuit**

Document ID: 16-SMOS-122, for INDUSTRIAL AIR PURIFICATION INC. SUMMONS SAVED AND ATTACHED IN PDF FORM FOR ATTORNEY TO RETRIEVE FROM SECURE CASE.NET. CLM

06/02/2016

**Filing Info Sheet eFiling**

**Filed By:** RONALD JAY EISENBERG

**Pet Filed in Circuit Ct**

Class Action Junk-Fax Petition; Ex 1 Junk Fax.

**On Behalf Of:** CONNECTOR CASTINGS INC

**Judge Assigned**

**IN THE MISSOURI CIRCUIT COURT  
FOR THE ELEVENTH JUDICIAL CIRCUIT  
COUNTY OF ST. CHARLES**

**CONNECTOR CASTINGS, INC.,** )  
 )  
 **Plaintiff,** )  
 )  
 **v.** )  
 ) **JURY TRIAL DEMANDED**  
 **INDUSTRIAL AIR PURIFICATION,** )  
 **INC.,** )  
 )  
 **Serve:** )  
 **Candyce Bradshaw, President** )  
 **or Person in Charge** )  
 **2551 Hidden Cove Rd.** )  
 **Cookeville, TN 38506** )  
 )  
 **DONALD CAMPBELL a/k/a DON** )  
 **CAMPBELL,** )  
 )  
 **Serve:** )  
 **2551 Hidden Cove Rd.** )  
 **Cookeville, TN 38506** )  
 )  
 **and** )  
 )  
 **JOHN DOES 1-10,** )  
 )  
 **Defendants.** )

**CLASS ACTION JUNK-FAX PETITION**

Plaintiff Connector Castings, Inc., brings this junk-fax class action, on behalf of itself and all others similarly situated, against Defendants Industrial Air Purification, Inc., Donald Campbell a/k/a Don Campbell, and John Does 1-10 under the Telephone Consumer Protection Act of 1991, as amended by the Junk Fax Prevention Act of 2005, 47 U.S.C. § 227, and the regulations promulgated thereunder (TCPA).

## **PARTIES, JURISDICTION, AND VENUE**

1. Plaintiff Connector Castings, Inc., is a Missouri corporation with its principal place of business in St. Louis City, Missouri.

2. Defendant Industrial Air Purification, Inc., is a Tennessee corporation with its principal place of business in Cookeville, Tennessee.

3. Defendant Donald Campbell a/k/a Don Campbell is an individual who, on information and belief, resides in Tennessee.

4. According to Campbell's LinkedIn profile, Campbell is an "Inside Sales / Product Designer at IAP Industrial Air Purification" in Cookeville, Tennessee. [https://www.linkedin.com/in/don-campbell-470035120?trk=seokp-title\\_posts\\_secondary\\_cluster\\_res\\_author\\_photo](https://www.linkedin.com/in/don-campbell-470035120?trk=seokp-title_posts_secondary_cluster_res_author_photo). (last visited June 2, 2016).

5. John Does 1-10 are not presently known and will be identified through discovery.

6. This Court has personal jurisdiction over Defendants under 47 U.S.C. § 227(b)(3).

7. Venue is proper under Missouri Revised Statutes § 508.010.2.

## **THE FAX**

8. On May 24, 2016, Defendants used a telephone facsimile machine, computer, or other device to send to Plaintiff's telephone facsimile machine an unsolicited advertisement, a true and accurate copy of which is attached as **Exhibit 1** (Fax).

9. Pleading in the alternative to the previous paragraph, Plaintiff alleges that the Fax was sent on behalf of Defendants.

10. A smaller copy of the Fax follows:

05-24-2016 10:53

931-372-0051

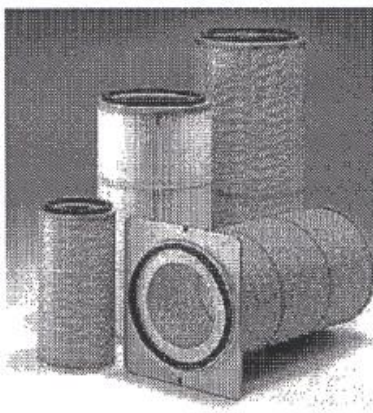
1/1

### To: Purchasing / Maintenance Buyer

Purchase Filters On-Line at: [www.IndustrialAirPurification.com](http://www.IndustrialAirPurification.com)  
Or call Don @ 931.372.0050 x 225

### Dust Collector Cartridge Filters

UAS - Dust Hog  
Donaldson Torit  
FARR  
Air Flow Systems  
Wheelabrator  
AAF  
Scientific  
Clark Filter  
Environmental Filter  
Clean Air America



Dustex  
AQE  
TDC Filter  
MAC  
Aercology  
AmTech  
Nordson  
Micro Air  
RoboVent  
And Many More

To request a quote, complete as much information known and fax back  
to 931-372-0051 or  
scan an email: [Don@IndustrialAirPurification.com](mailto:Don@IndustrialAirPurification.com)

Your Name: \_\_\_\_\_ Email Address: \_\_\_\_\_

Dust Collector Brand Name: \_\_\_\_\_

Dust Collector Model #: \_\_\_\_\_

Filter Part # (if known): \_\_\_\_\_ Quantity of Filters: \_\_\_\_\_

Dust Collector Application: \_\_\_\_\_

To opt out, email [Don@IndustrialAirPurification.com](mailto:Don@IndustrialAirPurification.com)

11. Plaintiff received the Fax through Plaintiff's facsimile machine.

12. The Fax constitutes material advertising quality or commercial availability of property or goods, e.g., dust collector cartridge filters.

13. On information and belief, Defendants have sent other facsimile transmissions of material advertising the quality or commercial availability of property or goods to Plaintiff and to at least 40 other persons as part of a plan to broadcast fax advertisements, of which the Fax is an example, or, alternatively, the Fax was sent on behalf of Defendants.

14. Defendants approved, authorized and participated in the scheme to broadcast fax advertisements by (a) directing a list to be purchased or assembled, (b) directing and supervising employees or third parties to send the faxes, (c) creating and approving the fax form to be sent, and (d) determining the number and frequency of the facsimile transmissions.

15. Defendants had a high degree of involvement in, actual notice of, and/or ratified the unlawful fax broadcasting activity and failed to take steps to prevent such facsimile transmissions.

16. Defendants created, made, and/or ratified the sending of the Fax and other similar or identical facsimile advertisements, which Defendants sent to Plaintiff and to other members of the "Class" as defined below.

17. The Fax, and the other similar or identical facsimile advertisements, sent by and/or on behalf of Defendants, is part of Defendants' work or operations to market Defendants' products or goods.

18. The Fax and the other facsimile advertisements constitute material furnished in connection with Defendants' work or operations.

19. The Fax sent to Plaintiff, and the other facsimile advertisements sent by Defendants, lacked a TCPA-complaint opt-out notice informing the recipient of the ability and means to avoid future unsolicited advertisements.

20. Under the TCPA and 47 C.F.R. § 64.1200(a)(3)(iii), the opt-out notice required for all facsimile advertisements must meet the following criteria:

- (A) The notice is clear and conspicuous and on the first page of the advertisement;
- (B) The notice states that the recipient may make a request to the sender of the advertisement not to send any future advertisements to a telephone facsimile machine or machines and that failure to comply, within 30 days, with such a request meeting the requirements under paragraph (a)(4)(v) of this section is unlawful;
- (C) The notice sets forth the requirements for an opt-out request under paragraph (a)(4)(v) of this section
- (D) The notice includes—
  - (1) A domestic contact telephone number and facsimile machine number for the recipient to transmit such a request to the sender; and
  - (2) If neither the required telephone number nor facsimile machine number is a toll-free number, a separate cost-free mechanism including a Web site address or e-mail address, for a recipient to transmit a request pursuant to such notice to the sender of the advertisement. A local telephone number also shall constitute a cost-free mechanism so long as recipients are local and will not incur any long distance or other separate charges for calls made to such number; and
- (E) The telephone and facsimile numbers and cost-free mechanism identified in the notice must permit an individual or business to make an opt-out request 24 hours a day, 7 days a week.

21. Senders of fax ads must include certain information in an opt-out notice on the fax, even if the recipient previously agreed to receive fax ads from such senders. *See* 47 C.F.R. § 64.1200(a)(4)(iv).

22. Senders of fax ads must fully comply with the opt-out notice requirements of 47 C.F.R. § 64.1200(a)(4)(iii).

23. The Fax and Defendants' similar facsimile advertisements lacked a notice stating that the recipient may make a request to the sender of the advertisement not to send future advertisements to a telephone facsimile machine or machines and that failure to comply, within 30 days, with such a request meeting 47 C.F.R. § 64.1200(a)(4)(v)'s requirements is unlawful.

24. The transmissions of facsimile advertisements, including the Fax, to Plaintiff, lacked a notice that complied with 47 U.S.C. § 227(b)(1)(C) and 47 C.F.R. § 64.1200(a)(4)(iii).

25. On information and belief, Defendants faxed the same or other substantially similar facsimile advertisements to the members of the Class without first obtaining the recipients' prior express invitation or permission.

26. There is no reasonable means for Plaintiff or other Class members to avoid receiving unlawful faxes while continuing to receive lawful faxes.

27. Defendants violated the TCPA by transmitting the Fax to Plaintiff and to the Class members without obtaining their prior express invitation or permission and by not displaying the proper opt-out notice required by 47 C.F.R. § 64.1200(a)(4).



28. Defendants knew or should have known that (a) facsimile advertisements, including the Fax, were advertisements, (b) Plaintiff and the other Class members had not given their prior invitation or permission to receive facsimile advertisements, (c) no established business relationship existed with Plaintiff and the other Class members, and (d) Defendants' facsimile advertisements did not display a proper opt-out notice.

29. Defendants failed to determine correctly the legal restrictions on the use of facsimile transmissions and the application of those restrictions to facsimile advertisements, including the Fax, both to Plaintiff and the Class.

30. Pleading in the alternative to the allegations that Defendants knowingly violated the TCPA, Plaintiff alleges that Defendants did not intend to send transmissions of facsimile advertisements, including the Fax, to any person where such transmission was not authorized by law or by the recipient, and to the extent that any transmissions of facsimile advertisement was sent to any person and such transmission was not authorized by law or by the recipient, such transmission was made based on either Defendants' own understanding of the law and/or based on the representations of others on which Defendants reasonably relied.

31. The transmissions of facsimile advertisements, including the Fax, to Plaintiff and the Class caused unwanted use and destruction of their property, including toner or ink and paper, and caused undesired wear on hardware, interfered with the recipients' exclusive use of their property, occupied fax lines,

and interfered with their business and/or personal communications and privacy interests.

### **CLASS ACTION ALLEGATIONS**

32. Plaintiff brings this class action on behalf of the following class of persons, hereafter, the "Class":

All persons in the United States who on or after four years prior to the filing of this action, (1) were sent by or on behalf of Defendants a telephone facsimile message of material advertising the commercial availability or quality of any property, goods, or services, (2) with respect to whom Defendants cannot provide evidence of prior express invitation or permission for the sending of such faxes, and (3) either (a) with whom Defendants did not have an established business relationship, or (b) the fax identified in subpart (1) of this definition (i) did not display a clear and conspicuous opt-out notice on the first page stating that the recipient may make a request to the sender of the advertisement not to send any future advertisements to a telephone facsimile machine or machines and that failure to comply, within 30 days, with such a request meeting the requirements under 47 C.F.R. § 64.1200(a)(4)(v) is unlawful, (ii) lacked a telephone number for sending the opt-out request, or (iii) lacked a facsimile number for sending the opt-out request.

33. Excluded from the Class are Defendants, their employees, agents, and members of the judiciary.

34. This case is appropriate as a class action because:

a. Numerosity. On information and belief, based in part on review of the sophisticated Fax and online research, the Class includes at least 40 persons and is so numerous that joinder of all members is impracticable.

b. Commonality. Questions of fact or law common to the Class predominate over questions affecting only individual Class members, e.g.:

- i. Whether Defendants engaged in a pattern of sending unsolicited fax advertisements;
  - ii. Whether the Fax, and other faxes transmitted by or on behalf of Defendants, contains material advertising the commercial availability of any property, goods or services;
  - iii. Whether the Fax, and other faxes transmitted by or on behalf of Defendants, contains material advertising the quality of any property, goods or services;
  - iv. The manner and method Defendants used to compile or obtain the list of fax numbers to which Defendants sent the Fax and other unsolicited faxed advertisements;
  - v. Whether Defendants faxed advertisements without first obtaining the recipients' prior express invitation or permission;
  - vi. Whether Defendants violated 47 U.S.C. § 227;
  - vii. Whether Defendants willingly or knowingly violated 47 U.S.C. § 227;
  - viii. Whether Defendants violated 47 C.F.R. § 64.1200;
  - ix. Whether the Fax, and the other fax advertisements sent by or on behalf of Defendants, displayed the proper opt-out notice required by 47 C.F.R. § 64.1200(a)(4);
  - x. Whether the Court should award statutory damages per TCPA violation per fax;
  - xi. Whether the Court should award treble damages per TCPA violation per fax; and
  - xii. Whether the Court should enjoin Defendants from sending TCPA-violating facsimile advertisements in the future.
- c. Typicality. Plaintiff's claim is typical of the other Class members' claims, because, on information and belief, the Fax was substantially the same as the faxes sent by or on behalf of Defendants to the Class, and Plaintiff is making the same claim and seeking the same relief for itself and all Class members based on the same statute and regulation.
- d. Adequacy. Plaintiff will fairly and adequately protect the interests of the other Class members. Plaintiff's counsel are experienced in class

actions and TCPA claims. Neither Plaintiff nor Plaintiff's counsel has interests adverse or in conflict with the absent Class members.

e. Superiority. A class action is the superior method for adjudicating this controversy fairly and efficiently. The interest of each individual Class member in controlling the prosecution of separate claims is small and individual actions are not economically feasible.

35. The TCPA prohibits the "use of any telephone facsimile machine, computer or other device to send an unsolicited advertisement to a telephone facsimile machine." 47 U.S.C. § 227(b)(1).

36. The TCPA defines "unsolicited advertisement," as "any material advertising the commercial availability or quality of any property, goods, or services which is transmitted to any person without that person's express invitation or permission." 47 U.S.C. § 227(a)(4).

37. The TCPA provides:

Private right of action. A person may, if otherwise permitted by the laws or rules of court of a state, bring in an appropriate court of that state:

(A) An action based on a violation of this subsection or the regulations prescribed under this subsection to enjoin such violation,

(B) An action to recover for actual monetary loss from such a violation, or to receive \$500 in damages for each such violation, whichever is greater, or

(C) Both such actions.

47 U.S.C. § 227(b)(3)(A)-(C).

38. The TCPA also provides that that Court, in its discretion, may treble the statutory damages if a defendant “willfully or knowingly” violated Section 227(b) or the regulations prescribed thereunder.

39. “A facsimile broadcaster will be liable for violations of [Section 64.1200(a)(4)]. . . , including the inclusion of opt-out notices on unsolicited advertisements, if it demonstrates a high degree of involvement in, or actual notice of, the unlawful activity and fails to take steps to prevent such facsimile transmissions.” 47 C.F.R. § 64.1200(a)(4)(vii).

40. Because the TCPA is a strict liability statute; Defendants are liable to Plaintiff and the Class even if Defendants only acted negligently.

41. Defendants’ actions caused damage to Plaintiff and the Class, as
- a. receiving Defendants’ faxed advertisements caused the recipients to lose paper and toner consumed in printing Defendants’ faxes;
  - b. Defendants’ actions interfered with the recipients’ use of the recipients’ fax machines and telephone lines;
  - c. Defendants’ faxes cost the recipients time, which was wasted time receiving, reviewing, and routing the unlawful faxes, and such time otherwise would have been spent on business activities; and
  - d. Defendants’ faxes unlawfully interrupted the recipients’ privacy interests in being left alone.

42. Defendants intended to cause damage to Plaintiff and the Class, to violate their privacy, to interfere with the recipients’ fax machines, or to

consume the recipients' valuable time with Defendants' advertisements; therefore, treble damages are warranted under 47 U.S.C. § 227(b)(3).

43. Defendants knew or should have known that (a) Plaintiff and the other Class members had not given express invitation or permission for Defendants or anyone else to fax advertisements about Defendants' property, goods, or services, (b) Defendants did not have an established business relationship with Plaintiff and the other Class members, (c) the Fax and the other facsimile advertisements were advertisements, and (d) the Fax and the other facsimile advertisements did not display the proper opt out notice.

44. Defendants violated the TCPA by transmitting the Fax to Plaintiff and substantially similar facsimile advertisements to the other Class members without obtaining their prior express invitation or permission and by not displaying the proper opt-out notice required by 47 C.F.R. § 64.1200(a)(4)(iii).

WHEREFORE, Plaintiff, individually and on behalf of all others similarly situated, demands judgment in its favor and against all Defendants, jointly and severally, as follows:

- a. certify this action as a class action and appoint Plaintiff as Class representative;
- b. appoint the undersigned counsel as Class counsel;
- c. award damages of \$500 per TCPA violation per facsimile pursuant to 47 U.S.C. § 227(a)(3)(B);
- d. award treble damages up to \$1,500 per TCPA violation per facsimile pursuant to 47 U.S.C. § 227(a)(3);
- e. enjoin Defendants and their contractors, agents, and employees from continuing to send TCPA-violating facsimiles pursuant to 47 U.S.C. § 227(a)(3)(A);

- f. award class counsel reasonable attorneys' fees and all expenses of this action and require Defendants to pay the costs and expenses of class notice and claim administration;
- g. award Plaintiff an incentive award based upon its time expended on behalf of the Class and other relevant factors;
- h. award Plaintiff prejudgment interest and costs; and
- i. grant Plaintiff all other relief deemed just and proper.

### **DOCUMENT PRESERVATION DEMAND**

Plaintiff demands that Defendants take affirmative steps to preserve all records, lists, electronic databases, or other itemization of telephone or fax numbers associated with the Defendants and the communication or transmittal of advertisements as alleged herein.

SCHULTZ & ASSOCIATES LLP

By: /s/ Ronald J. Eisenberg  
Ronald J. Eisenberg, #48674  
Robert Schultz, #35329  
640 Cepi Drive, Suite A  
Chesterfield, MO 63005  
636-537-4645  
Fax: 636-537-2599  
[reisenberg@sl-lawyers.com](mailto:reisenberg@sl-lawyers.com)  
[rschultz@sl-lawyers.com](mailto:rschultz@sl-lawyers.com)

*Attorneys for Plaintiff*

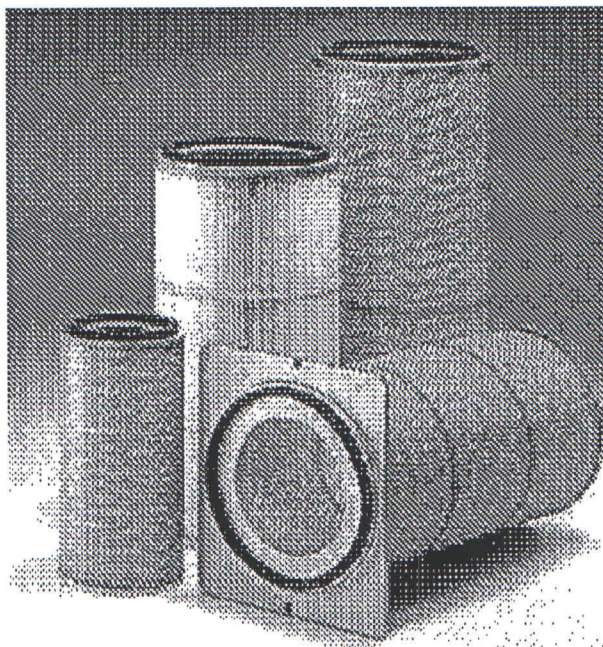


## To: Purchasing / Maintenance Buyer

**Purchase Filters On-Line at: [www.IndustrialAirPurification.com](http://www.IndustrialAirPurification.com)**  
**Or call Don @ 931.372.0050 x 225**

## Dust Collector Cartridge Filters

*UAS – Dust Hog*  
*Donaldson Torit*  
*FARR*  
*Air Flow Systems*  
*Wheelabrator*  
*AAF*  
*Scientific*  
*Clark Filter*  
*Environmental Filter*  
*Clean Air America*



*Dustex*  
*AQE*  
*TDC Filter*  
*MAC*  
*Aercology*  
*AmTech*  
*Nordson*  
*Micro Air*  
*RoboVent*  
*And Many More*

**To request a quote, complete as much information known and fax back  
to 931-372-0051 or  
scan an email: [Don@IndustrialAirPurification.com](mailto:Don@IndustrialAirPurification.com)**

Your Name: \_\_\_\_\_ Email Address: \_\_\_\_\_

Dust Collector Brand Name: \_\_\_\_\_

Dust Collector Model #: \_\_\_\_\_

Filter Part # (if known): \_\_\_\_\_ Quantity of Filters: \_\_\_\_\_

Dust Collector Application: \_\_\_\_\_

To opt out, email [Don@IndustrialAirPurification.com](mailto:Don@IndustrialAirPurification.com)





## IN THE 11TH JUDICIAL CIRCUIT COURT, ST. CHARLES COUNTY, MISSOURI

Judge or Division: TED HOUSE	Case Number: 1611-CC00501
Plaintiff/Petitioner: CONNECTOR CASTINGS, INC.	Plaintiff's/Petitioner's Attorney/Address: RONALD JAY EISENBERG 640 CEPI DRIVE SUITE A CHESTERFIELD, MO 63005
Defendant/Respondent: INDUSTRIAL AIR PURIFICATION INC	Court Address: 300 N 2nd STREET SAINT CHARLES, MO 63301
Nature of Suit: CC Other Miscellaneous Actions	

(Date File Stamp)

**Summons for Personal Service Outside the State of Missouri  
(Except Attachment Action)**

<p>The State of Missouri to: <b>INDUSTRIAL AIR PURIFICATION INC</b>  <b>Alias:</b>  <b>CANDYCE BRADSHAW PRESIDENT</b>  <b>OR PERSON IN CHARGE</b>  <b>2551 HIDDEN COVE RD</b>  <b>COOKEVILLE, TN 38506</b></p>	
<p><b>COURT SEAL OF</b></p> <p><b>ST. CHARLES COUNTY</b></p>	<p>You are summoned to appear before this court and to file your pleading to the petition, copy of which is attached, and to serve a copy of your pleading upon the attorney for the Plaintiff/Petitioner at the above address all within 30 days after service of this summons upon you, exclusive of the day of service. If you fail to file your pleading, judgment by default will be taken against you for the relief demanded in this action.</p> <p align="center">6/6/2016 /S/ Judy Zerr Date Clerk</p> <p>Further Information:</p>
<b>Officer's or Server's Affidavit of Service</b>	
<p>I certify that:</p> <p>1. I am authorized to serve process in civil actions within the state or territory where the above summons was served.</p> <p>2. My official title is _____ of _____ County, _____ (state).</p> <p>3. I have served the above summons by: (check one)</p> <p><input type="checkbox"/> delivering a copy of the summons and a copy of the petition to the Defendant/Respondent.</p> <p><input type="checkbox"/> leaving a copy of the summons and a copy of the petition at the dwelling place or usual abode of the Defendant/Respondent with _____, a person of the Defendant's/Respondent's family over the age of 15 years.</p> <p><input type="checkbox"/> (for service on a corporation) delivering a copy of the summons and a copy of the petition to _____ (name) _____ (title).</p> <p><input type="checkbox"/> other (describe) _____.</p> <p>Served at _____ (address)  in _____ County, _____ (state), on _____ (date) at _____ (time).</p> <p>_____  Printed Name of Sheriff or Server Signature of Sheriff or Server</p> <p><b>Subscribed and Sworn To</b> me before this _____ (day) _____ (month) _____ (year)</p> <p>I am: (check one) <input type="checkbox"/> the clerk of the court of which affiant is an officer.  <input type="checkbox"/> the judge of the court of which affiant is an officer.  <input type="checkbox"/> authorized to administer oaths in the state in which the affiant served the above summons.  (use for out-of-state officer)  <input type="checkbox"/> authorized to administer oaths. (use for court-appointed server)</p> <p align="right">_____  Signature and Title</p>	
<p><b>Service Fees, if applicable</b></p> <p>Summons \$ _____</p> <p>Non Est \$ _____</p> <p>Mileage \$ _____ (_____ miles @ \$ _____ per mile)</p> <p><b>Total</b> \$ _____</p> <p align="center"><b>See the following page for directions to clerk and to officer making return on service of summons.</b></p>	

### **Directions to Clerk**

Personal service outside the State of Missouri is permitted only upon certain conditions set forth in Rule 54. The clerk should insert in the summons the names of only the Defendant/Respondent or Defendants/Respondents who are to be personally served by the officer to whom the summons is delivered. The summons should be signed by the clerk or deputy clerk under the seal of the court and a copy of the summons and a copy of the petition for each Defendant/Respondent should be mailed along with the original summons to the officer who is to make service. The copy of the summons may be a carbon or other copy and should be signed and sealed in the same manner as the original but it is unnecessary to certify that the copy is a true copy. The copy of the motion may be a carbon or other copy and should be securely attached to the copy of the summons but need not be certified a true copy. If the Plaintiff's/Petitioner has no attorney, the Plaintiff's/Petitioner's address and telephone number should be stated in the appropriate square on the summons. This form is not for use in attachment actions. (See Rule 54.06, 54.07 and 54.14)

### **Directions to Officer Making Return on Service of Summons**

A copy of the summons and a copy of the motion must be served on each Defendant/Respondent. If any Defendant/Respondent refuses to receive the copy of the summons and motion when offered, the return shall be prepared accordingly so as to show the offer of the officer to deliver the summons and motion and the Defendant's/Respondent's refusal to receive the same.

Service shall be made: (1) On Individual. On an individual, including an infant or incompetent person not having a legally appointed guardian, by delivering a copy of the summons and motion to the individual personally or by leaving a copy of the summons and motion at the individual's dwelling house or usual place of abode with some person of the family over 15 years of age, or by delivering a copy of the summons and petition to an agent authorized by appointment or required by law to receive service of process; (2) On Guardian. On an infant or incompetent person who has a legally appointed guardian, by delivering a copy of the summons and motion to the guardian personally; (3) On Corporation, Partnership or Other Unincorporated Association. On a corporation, partnership or unincorporated association, by delivering a copy of the summons and motion to an officer, partner, or managing or general agent, or by leaving the copies at any business office of the Defendant/Respondent with the person having charge thereof or by delivering copies to its registered agent or to any other agent authorized by appointment or required by law to receive service of process; (4) On Public or Quasi-Public Corporation or Body. Upon a public, municipal, governmental or quasi-public corporation or body in the case of a county, to the mayor or city clerk or city attorney in the case of a city, to the chief executive officer in the case of any public, municipal, governmental, or quasi-public corporation or body or to any person otherwise lawfully so designated.

Service may be made by an officer or deputy authorized by law to serve process in civil actions within the state or territory where such service is made.

Service may be made in any state or territory of the United States. If served in a territory, substitute the word "territory" for the word "state."

The officer making the service must swear an affidavit before the clerk, deputy clerk, or judge of the court of which the person is an officer or other person authorized to administer oaths. This affidavit must state the time, place, and manner of service, the official character of the affiant, and the affiant's authority to serve process in civil actions within the state or territory where service is made.

Service must not be made less than ten days nor more than 30 days from the date the Defendant/Respondent is to appear in court. The return should be made promptly and in any event so that it will reach the Missouri Court within 30 days after service.



## IN THE 11TH JUDICIAL CIRCUIT COURT, ST. CHARLES COUNTY, MISSOURI

Judge or Division: TED HOUSE	Case Number: 1611-CC00501	(Date File Stamp)
Plaintiff/Petitioner: CONNECTOR CASTINGS, INC.	Plaintiff's/Petitioner's Attorney/Address: RONALD JAY EISENBERG 640 CEPI DRIVE SUITE A CHESTERFIELD, MO 63005	
Defendant/Respondent: INDUSTRIAL AIR PURIFICATION INC	Court Address: 300 N 2nd STREET SAINT CHARLES, MO 63301	
Nature of Suit: CC Other Miscellaneous Actions		

**Summons for Personal Service Outside the State of Missouri  
(Except Attachment Action)**

<p>The State of Missouri to: <b>DONALD CAMPBELL</b>          Alias: <b>DON CAMPBELL</b>          2551 HIDDEN COVE RD.          COOKEVILLE, TN 38506</p>	
<p><b>COURT SEAL OF</b></p> <p><b>ST. CHARLES COUNTY</b></p>	<p>You are summoned to appear before this court and to file your pleading to the petition, copy of which is attached, and to serve a copy of your pleading upon the attorney for the Plaintiff/Petitioner at the above address all within 30 days after service of this summons upon you, exclusive of the day of service. If you fail to file your pleading, judgment by default will be taken against you for the relief demanded in this action.</p> <p align="center">         6/6/2016 _____ /S/ Judy Zerr          Date Clerk       </p> <p>Further Information: _____</p>
<p><b>Officer's or Server's Affidavit of Service</b></p>	
<p>I certify that:</p> <p>4. I am authorized to serve process in civil actions within the state or territory where the above summons was served.</p> <p>5. My official title is _____ of _____ County, _____ (state).</p> <p>6. I have served the above summons by: (check one)</p> <p><input type="checkbox"/> delivering a copy of the summons and a copy of the petition to the Defendant/Respondent.</p> <p><input type="checkbox"/> leaving a copy of the summons and a copy of the petition at the dwelling place or usual abode of the Defendant/Respondent with _____, a person of the Defendant's/Respondent's family over the age of 15 years.</p> <p><input type="checkbox"/> (for service on a corporation) delivering a copy of the summons and a copy of the petition to _____ (name) _____ (title).</p> <p><input type="checkbox"/> other (describe) _____.</p> <p>Served at _____ (address)          in _____ County, _____ (state), on _____ (date) at _____ (time).</p> <p>_____          Printed Name of Sheriff or Server       </p> <p align="right">_____          Signature of Sheriff or Server       </p> <p><b>Subscribed and Sworn To</b> me before this _____ (day) _____ (month) _____ (year)</p> <p>I am: (check one) <input type="checkbox"/> the clerk of the court of which affiant is an officer.</p> <p><input type="checkbox"/> the judge of the court of which affiant is an officer.</p> <p><input type="checkbox"/> authorized to administer oaths in the state in which the affiant served the above summons.          (use for out-of-state officer)</p> <p><input type="checkbox"/> authorized to administer oaths. (use for court-appointed server)</p> <p align="right">_____          Signature and Title       </p>	
<p><b>Service Fees, if applicable</b></p> <p>Summons \$ _____</p> <p>Non Est \$ _____</p> <p>Mileage \$ _____ (_____ miles @ \$ _____ per mile)</p> <p><b>Total</b> \$ _____</p> <p align="center">See the following page for directions to clerk and to officer making return on service of summons.</p>	

### **Directions to Clerk**

Personal service outside the State of Missouri is permitted only upon certain conditions set forth in Rule 54. The clerk should insert in the summons the names of only the Defendant/Respondent or Defendants/Respondents who are to be personally served by the officer to whom the summons is delivered. The summons should be signed by the clerk or deputy clerk under the seal of the court and a copy of the summons and a copy of the petition for each Defendant/Respondent should be mailed along with the original summons to the officer who is to make service. The copy of the summons may be a carbon or other copy and should be signed and sealed in the same manner as the original but it is unnecessary to certify that the copy is a true copy. The copy of the motion may be a carbon or other copy and should be securely attached to the copy of the summons but need not be certified a true copy. If the Plaintiff's/Petitioner has no attorney, the Plaintiff's/Petitioner's address and telephone number should be stated in the appropriate square on the summons. This form is not for use in attachment actions. (See Rule 54.06, 54.07 and 54.14)

### **Directions to Officer Making Return on Service of Summons**

A copy of the summons and a copy of the motion must be served on each Defendant/Respondent. If any Defendant/Respondent refuses to receive the copy of the summons and motion when offered, the return shall be prepared accordingly so as to show the offer of the officer to deliver the summons and motion and the Defendant's/Respondent's refusal to receive the same.

Service shall be made: (1) On Individual. On an individual, including an infant or incompetent person not having a legally appointed guardian, by delivering a copy of the summons and motion to the individual personally or by leaving a copy of the summons and motion at the individual's dwelling house or usual place of abode with some person of the family over 15 years of age, or by delivering a copy of the summons and petition to an agent authorized by appointment or required by law to receive service of process; (2) On Guardian. On an infant or incompetent person who has a legally appointed guardian, by delivering a copy of the summons and motion to the guardian personally; (3) On Corporation, Partnership or Other Unincorporated Association. On a corporation, partnership or unincorporated association, by delivering a copy of the summons and motion to an officer, partner, or managing or general agent, or by leaving the copies at any business office of the Defendant/Respondent with the person having charge thereof or by delivering copies to its registered agent or to any other agent authorized by appointment or required by law to receive service of process; (4) On Public or Quasi-Public Corporation or Body. Upon a public, municipal, governmental or quasi-public corporation or body in the case of a county, to the mayor or city clerk or city attorney in the case of a city, to the chief executive officer in the case of any public, municipal, governmental, or quasi-public corporation or body or to any person otherwise lawfully so designated.

Service may be made by an officer or deputy authorized by law to serve process in civil actions within the state or territory where such service is made.

Service may be made in any state or territory of the United States. If served in a territory, substitute the word "territory" for the word "state."

The officer making the service must swear an affidavit before the clerk, deputy clerk, or judge of the court of which the person is an officer or other person authorized to administer oaths. This affidavit must state the time, place, and manner of service, the official character of the affiant, and the affiant's authority to serve process in civil actions within the state or territory where service is made.

Service must not be made less than ten days nor more than 30 days from the date the Defendant/Respondent is to appear in court. The return should be made promptly and in any event so that it will reach the Missouri Court within 30 days after service.

STATE OF MISSOURI )  
 ) ss.  
ST. CHARLES COUNTY, MISSOURI )

IN THE CIRCUIT COURT OF ST. CHARLES COUNTY, MISSOURI

## NOTICE OF ALTERNATIVE DISPUTE RESOLUTION SERVICES

Pursuant to Missouri Supreme Court Rule 17, the Circuit Court of St. Charles County, Missouri (Eleventh Judicial Circuit) has adopted a local rule to encourage voluntary alternative dispute resolution. The purpose of the rule and the program it establishes is to foster timely, economical, fair and voluntary settlements of lawsuits without delaying or interfering with a party's right to resolve a lawsuit by trial.

This program applies to all civil actions other than cases in the small claims, probate and family court divisions of the Circuit Court, and you are hereby notified that it is available to you in this case.

The program encourages the voluntary early resolution of disputes through mediation. Mediation is an informal non-binding alternative dispute resolution process in which a trained mediator facilitates discussions and negotiations among the parties to help them resolve their dispute. The mediator is impartial and has no authority to render a decision or impose a resolution on the parties. During the course of the mediation, the mediator may meet with the parties together and separately to discuss the dispute, to explore the parties' interests, and to stimulate ideas for resolution of the dispute.

A list of mediators approved by the court and information regarding their qualifications is kept by the Circuit Clerk's Office. If all parties to the suit agree to mediation, within ten days after they have filed the Consent to Mediation Form on the reverse side of this page with the Clerk of the Court, they shall jointly select from that list a mediator who is willing and available to serve. If the parties cannot agree upon the mediator to be selected, the Court will make the selection.

The full text of the Circuit Court’s local court rules, including Rule 38 Alternative Dispute Resolution, is available from the Clerk of the Circuit Court or at:  
[http://www.courts.mo.gov/hosted/circuit11/Documents/LOCAL\\_COURT\\_RULES.pdf](http://www.courts.mo.gov/hosted/circuit11/Documents/LOCAL_COURT_RULES.pdf)

A copy of this Notice is to be provided by the Clerk of the Circuit Court to each of the parties initiating the suit at the time it is filed, and a copy is to be served on each other party in the suit with the summons and petition served on that party.

STATE OF MISSOURI )  
 ) ss.  
ST. CHARLES COUNTY, MISSOURI )

IN THE CIRCUIT COURT OF ST. CHARLES COUNTY, MISSOURI

\_\_\_\_\_  
Plaintiff(s), )  
 )  
vs. ) Cause # \_\_\_\_\_  
 )  
\_\_\_\_\_  
Defendant(s). )

**CONSENT TO MEDIATION FORM**

I, the undersigned counsel of record in this case, hereby certify that I have discussed the subject of mediation under the Court's Alternative Dispute Resolution Program with my client(s) in this case and that:

\_\_\_\_\_ We believe that mediation would be helpful in this case and consent to the referral of the case to mediation upon the filing of similar consents by all other parties in the case.

\_\_\_\_\_ We do not consent to the referral of this case to mediation.

\_\_\_\_\_  
Signature

\_\_\_\_\_  
(Print Name)

Attorney for:

\_\_\_\_\_  
(Party or Parties)

Date: \_\_\_\_\_

**IN THE MISSOURI CIRCUIT COURT  
FOR THE ELEVENTH JUDICIAL CIRCUIT  
COUNTY OF ST. CHARLES**

<b>CONNECTOR CASTINGS, INC.,</b>	)	
	)	
<b>Plaintiff,</b>	)	
	)	
<b>v.</b>	)	
	)	<b>No. 1611-CC00501</b>
<b>INDUSTRIAL AIR PURIFICATION,</b>	)	
<b>INC., DONALD CAMPBELL a/k/a</b>	)	<b>Div. 1</b>
<b>DON CAMPBELL, et al.,</b>	)	
	)	
<b>Defendants.</b>	)	

**PLAINTIFF'S MOTION FOR EXTENSION TO TIME TO SERVE  
DEFENDANTS**

Plaintiff Connector Castings, Inc., pursuant to Missouri Supreme Court Rule 54.21, requests that the deadline for service of the summonses and petition on Defendants be extended to 90 days from issuance of the summonses on June 6, 2016, in order to allow sufficient time to obtain service on Defendants, who reside outside of Missouri.

Plaintiff intends to mail Civil Procedure Form 4B Notices, in accordance with Missouri Supreme Court Rule 54.16, requesting that Defendants voluntarily acknowledge service by mail. Rule 54.16 grants the recipients 30 days to complete and return the Form 4B notice.

SO ORDERED THIS \_\_\_\_ DAY OF JUNE, 2016

\_\_\_\_\_  
Ted House, Circuit Judge

SCHULTZ & ASSOCIATES LLP

By: /s/ Ronald J. Eisenberg  
Ronald J. Eisenberg, #48674  
640 Cepi Drive, Suite A  
Chesterfield, MO 63005  
636-537-4645  
Fax: 636-537-2599  
[reisenberg@sl-lawyers.com](mailto:reisenberg@sl-lawyers.com)

*Attorney for Plaintiff*

**CERTIFICATE OF SERVICE**

The above-signed certifies that on June 6, 2016, this document was eFiled.



**IN THE MISSOURI CIRCUIT COURT  
FOR THE ELEVENTH JUDICIAL CIRCUIT  
COUNTY OF ST. CHARLES**

**FILED****JUN 10 2016**

JUDY ZERR  
CIRCUIT CLERK  
ST. CHARLES CO

**CONNECTOR CASTINGS, INC.,****Plaintiff,****v.**

**INDUSTRIAL AIR PURIFICATION,  
INC., DONALD CAMPBELL a/k/a  
DON CAMPBELL, et al.,**

**Defendants.****No. 1611-CC00501****Div. 1**

**PLAINTIFF'S MOTION FOR EXTENSION TO TIME TO SERVE  
DEFENDANTS**

Plaintiff Connector Castings, Inc., pursuant to Missouri Supreme Court Rule 54.21, requests that the deadline for service of the summonses and petition on Defendants be extended to 90 days from issuance of the summonses on June 6, 2016, in order to allow sufficient time to obtain service on Defendants, who reside outside of Missouri.

Plaintiff intends to mail Civil Procedure Form 4B Notices, in accordance with Missouri Supreme Court Rule 54.16, requesting that Defendants voluntarily acknowledge service by mail. Rule 54.16 grants the recipients 30 days to complete and return the Form 4B notice.

SO ORDERED THIS 10 DAY OF JUNE, 2016

  
\_\_\_\_\_  
Ted House, Circuit Judge

SCHULTZ & ASSOCIATES LLP

By: /s/ Ronald J. Eisenberg  
Ronald J. Eisenberg, #48674  
640 Cepi Drive, Suite A  
Chesterfield, MO 63005  
636-537-4645  
Fax: 636-537-2599  
reisenberg@sl-lawyers.com

*Attorney for Plaintiff*

**CERTIFICATE OF SERVICE**

The above-signed certifies that on June 6, 2016, this document was eFiled.



## IN THE 11TH JUDICIAL CIRCUIT COURT, ST. CHARLES COUNTY, MISSOURI

Judge or Division: TED HOUSE	Case Number: 1611-CC1
Plaintiff/Petitioner: CONNECTOR CASTINGS, INC.	Plaintiff's/Petitioner's Atto RONALD JAY EISENBERG 640 CEPI DRIVE SUITE A CHESTERFIELD, MO 63005
Defendant/Respondent: INDUSTRIAL AIR PURIFICATION INC	Court Address: 300 N 2nd STREET SAINT CHARLES, MO 63
Nature of Suit: CC Other Miscellaneous Actions	

8/3/16 12:50 Small 3rd floor  
8/10/16 12:10 Carlile card  
8/17/16 9:48 Carlile card  
1/18/16 8:05 Carlile card  
8/24/16 8:49 Carlile

### Summons for Personal Service Outside the State (Except Attachment Action)

The State of Missouri to: DONALD CAMPBELL  
Alias: DON CAMPBELL  
2551 HIDDEN COVE RD.  
COOKEVILLE, TN 38506

maybe in after 8pm

COURT SEAL OF



ST. CHARLES COUNTY

You are summoned to appear before this court and to file and to serve a copy of your pleading upon the attorney for the defendant at the above address all within 30 days after service of this summons upon you, exclusive of the day of service. If you fail to file your pleading, judgment by default will be taken against you for the relief demanded in this action.

6/6/2016 Date /s/ Judy Zerr Clerk

Further Information:

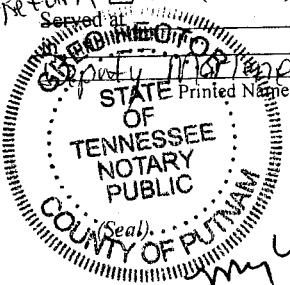
### Officer's or Server's Affidavit of Service

I certify that:

4. I am authorized to serve process in civil actions within the state or territory where the above summons was served.  
5. My official title is Deputy Sheriff of Putnam County, TN (state).  
6. I have served the above summons by: (check one)

- ☐ delivering a copy of the summons and a copy of the petition to the Defendant/Respondent.  
☐ leaving a copy of the summons and a copy of the petition at the dwelling place or usual abode of the Defendant/Respondent with a person of the Defendant's/Respondent's family over the age of 15 years.  
☐ (for service on a corporation) delivering a copy of the summons and a copy of the petition to

Return ☐ other (describe) not able to make contact with subject + went to residence 5 to mas  
Served at \_\_\_\_\_ County, \_\_\_\_\_ (state), on 8/24/2016 (date) at 13:26 (time).  
Printed Name of Sheriff or Server Deputy Sheriff Carlile Signature of Sheriff or Server [Signature]

Subscribed and Sworn To me before this 24th (day) August (month) 2016 (year)

- I am: (check one) ☐ the clerk of the court of which affiant is an officer.  
☐ the judge of the court of which affiant is an officer.  
☐ authorized to administer oaths in the state in which the affiant served the above summons.  
(use for out-of-state officer)  
☒ authorized to administer oaths. (use for court-appointed server)

Signature and Title

## Service Fees, if applicable

Summons \$ \_\_\_\_\_  
Non Est \$ \_\_\_\_\_  
Mileage \$ \_\_\_\_\_ ( \_\_\_\_\_ miles @ \$ \_\_\_\_\_ per mile)  
Total \$ \_\_\_\_\_

See the following page for directions to clerk and to officer making return on service of summons.



## IN THE 11TH JUDICIAL CIRCUIT COURT, ST. CHARLES COUNTY, MISSOURI

Judge or Division: TED HOUSE	Case Number: 1611-CC00501
Plaintiff/Petitioner: CONNECTOR CASTINGS, INC.	Plaintiff's/Petitioner's Attorney/Address: RONALD JAY EISENBERG 640 CEPI DRIVE SUITE A CHESTERFIELD, MO 63005
Defendant/Respondent: INDUSTRIAL AIR PURIFICATION INC	Court Address: 300 N 2nd STREET SAINT CHARLES, MO 63301
Nature of Suit: CC Other Miscellaneous Actions	(Date File Stamp)

### Summons for Personal Service Outside the State of Missouri (Except Attachment Action)

The State of Missouri to: **INDUSTRIAL AIR PURIFICATION INC**  
Alias:  
CANDYCE BRADSHAW PRESIDENT  
OR PERSON IN CHARGE  
2551 HIDDEN COVE RD  
COOKEVILLE, TN 38506

**COURT SEAL OF**

ST. CHARLES COUNTY

You are summoned to appear before this court and to file your pleading to the petition, copy of which is attached, and to serve a copy of your pleading upon the attorney for the Plaintiff/Petitioner at the above address all within 30 days after service of this summons upon you, exclusive of the day of service. If you fail to file your pleading, judgment by default will be taken against you for the relief demanded in this action.

6/6/2016 Date /S/ Judy Zerr Clerk

Further Information:

#### Officer's or Server's Affidavit of Service

I certify that:

- I am authorized to serve process in civil actions within the state or territory where the above summons was served.
- My official title is Deputy Sheriff of Putnam County, TN (state).
- I have served the above summons by: (check one)
  - ☐ delivering a copy of the summons and a copy of the petition to the Defendant/Respondent.
  - ☐ leaving a copy of the summons and a copy of the petition at the dwelling place or usual abode of the Defendant/Respondent with a person of the Defendant's/Respondent's family over the age of 15 years.
  - ☐ (for service on a corporation) delivering a copy of the summons and a copy of the petition to \_\_\_\_\_ (name) \_\_\_\_\_ (title).
  - ☒ other (describe) went to residence 5 times, unable to make contact, \_\_\_\_\_ (address)

Served at \_\_\_\_\_ in \_\_\_\_\_ County, \_\_\_\_\_ (state), on 8/24/2016 (date) at 13:26 (time).

GREG RECTOR Printed Name of Sheriff or Server Deputy Sheriff Signature of Sheriff or Server

**Subscribed and Sworn** To me before this 24th (day) August (month) 2016 (year)

☒ am: (check one)
 

- ☐ the clerk of the court of which affiant is an officer.
- ☐ the judge of the court of which affiant is an officer.
- ☐ authorized to administer oaths in the state in which the affiant served the above summons. (use for out-of-state officer)
- ☒ authorized to administer oaths. (use for court-appointed server)

GREG RECTOR, Public Notary Signature and Title

**Service Fees, if applicable**

Summons	\$ _____
Non Est	\$ _____
Mileage	\$ _____ ( _____ miles @ \$ _____ per mile)
Total	\$ _____

See the following page for directions to clerk and to officer making return on service of summons.



## IN THE 11TH JUDICIAL CIRCUIT COURT, ST. CHARLES COUNTY, MISSOURI

Judge or Division: TED HOUSE	Case Number: 1611-CC(	8/3/16 12:50 Smith 3rd
Plaintiff/Petitioner: CONNECTOR CASTINGS, INC.	Plaintiff's/Petitioner's Atto RONALD JAY EISENBEI 640 CEPI DRIVE SUITE A CHESTERFIELD, MO 63005	8/10/16 12:10 Carlile Carol
Defendant/Respondent: INDUSTRIAL AIR PURIFICATION INC	vs. COURT ADDRESS: 300 N 2nd STREET SAINT CHARLES, MO 63	8/17/16 9:48 Carlile Carol
Nature of Suit: CC Other Miscellaneous Actions		1/18/16 8:05 Carlile Carol
		8/24/16 8:49 Carlile

### Summons for Personal Service Outside the State (Except Attachment Action)

The State of Missouri to: DONALD CAMPBELL  
Alias: DON CAMPBELL  
2551 HIDDEN COVE RD.  
COOKEVILLE, TN 38506

maybe in after 8pm

COURT SEAL OF



ST. CHARLES COUNTY

You are summoned to appear before this court and to file and to serve a copy of your pleading upon the attorney for the defendant at the above address all within 30 days after service of this summons upon you, exclusive of the day of service. If you fail to file your pleading, judgment by default will be taken against you for the relief demanded in this action.

6/6/2016

Date

/s/ Judy Zerr

Clerk

Further Information:

#### Officer's or Server's Affidavit of Service

I certify that:

4. I am authorized to serve process in civil actions within the state or territory where the above summons was served.  
5. My official title is Deputy Sheriff of Putnam County, TN (state).  
6. I have served the above summons by: (check one)

- ☐ delivering a copy of the summons and a copy of the petition to the Defendant/Respondent.  
☐ leaving a copy of the summons and a copy of the petition at the dwelling place or usual abode of the Defendant/Respondent with a person of the Defendant's/Respondent's family over the age of 15 years.  
☐ (for service on a corporation) delivering a copy of the summons and a copy of the petition to

☐ other (describe) not able to make contact with subject. Went to residence 5 times.

Served at \_\_\_\_\_ County, \_\_\_\_\_ (state), on 8/24/2016 (date) at 13:26 (time).

Deputy Sheriff Carlile  
Printed Name of Sheriff or Server

Signature of Sheriff or Server

Subscribed and Sworn To me before this 24th (day) August (month) 2016 (year)

I am: (check one)

- ☐ the clerk of the court of which affiant is an officer.  
☐ the judge of the court of which affiant is an officer.  
☐ authorized to administer oaths in the state in which the affiant served the above summons.  
(use for out-of-state officer)  
☒ authorized to administer oaths. (use for court-appointed server)

Signature and Title

#### Service Fees, if applicable

Summons \$ \_\_\_\_\_  
Non Est \$ \_\_\_\_\_  
Mileage \$ \_\_\_\_\_ ( \_\_\_\_\_ miles @ \$ \_\_\_\_\_ per mile)  
Total \$ \_\_\_\_\_

See the following page for directions to clerk and to officer making return on service of summons.





## IN THE 11TH JUDICIAL CIRCUIT COURT, ST. CHARLES COUNTY, MISSOURI

Judge or Division: TED HOUSE	Case Number: 1611-CC00501
Plaintiff/Petitioner: CONNECTOR CASTINGS, INC.	Plaintiff's/Petitioner's Attorney/Address: RONALD JAY EISENBERG 640 CEPI DRIVE SUITE A CHESTERFIELD, MO 63005
Defendant/Respondent: INDUSTRIAL AIR PURIFICATION INC	Court Address: 300 N 2nd STREET SAINT CHARLES, MO 63301
Nature of Suit: CC Other Miscellaneous Actions	(Date File Stamp)

### Summons for Personal Service Outside the State of Missouri (Except Attachment Action)

The State of Missouri to: INDUSTRIAL AIR PURIFICATION INC

Alias:

CANDYCE BRADSHAW PRESIDENT  
OR PERSON IN CHARGE  
2551 HIDDEN COVE RD  
COOKEVILLE, TN 38506

COURT SEAL OF



ST. CHARLES COUNTY

You are summoned to appear before this court and to file your pleading to the petition, copy of which is attached, and to serve a copy of your pleading upon the attorney for the Plaintiff/Petitioner at the above address all within 30 days after service of this summons upon you, exclusive of the day of service. If you fail to file your pleading, judgment by default will be taken against you for the relief demanded in this action.

6/6/2016

Date

/S/ Judy Zerr

Clerk

Further Information:

## Officer's or Server's Affidavit of Service

I certify that:

1. I am authorized to serve process in civil actions within the state or territory where the above summons was served.
2. My official title is Deputy Sheriff of Putnam County, TN (state).
3. I have served the above summons by: (check one)

- ☐ delivering a copy of the summons and a copy of the petition to the Defendant/Respondent.
- ☐ leaving a copy of the summons and a copy of the petition at the dwelling place or usual abode of the Defendant/Respondent with \_\_\_\_\_, a person of the Defendant's/Respondent's family over the age of 15 years.
- ☐ (for service on a corporation) delivering a copy of the summons and a copy of the petition to \_\_\_\_\_ (name) \_\_\_\_\_ (title).

Return ☒ other (describe) went to residence 5 times, unable to make contact, (address)  
Served at \_\_\_\_\_ (address)  
in \_\_\_\_\_ County, \_\_\_\_\_ (state), on 8/24/2016 (date) at 13:26 (time).

Gregory Carlisle  
Printed Name of Sheriff or Server

Signature of Sheriff or Server

Subscribed and Sworn To me before this 24th (day) August (month) 2016 (year)

- I am: (check one)
- ☐ the clerk of the court of which affiant is an officer.
- ☐ the judge of the court of which affiant is an officer.
- ☐ authorized to administer oaths in the state in which the affiant served the above summons. (use for out-of-state officer)
- ☒ authorized to administer oaths. (use for court-appointed server)

Signature and Title

## Service Fees, if applicable

Summons \$ \_\_\_\_\_

Non Est \$ \_\_\_\_\_

Mileage \$ \_\_\_\_\_ ( \_\_\_\_\_ miles @ \$ \_\_\_\_\_ per mile)

Total \$ \_\_\_\_\_

See the following page for directions to clerk and to officer making return on service of summons.



## IN THE ELEVENTH JUDICIAL CIRCUIT, ST CHARLES COUNTY, MISSOURI

Judge or Division: 1	Case Number: 1611-CC00501
Plaintiff: CONNECTOR CASTINGS, INC.,	Defendant: INDUSTRIAL AIR PURIFICATION, INC., DONALD CAMPBELL a/k/a DON CAMPBELL, et al.,
(Date File Stamp)	

**REQUEST FOR APPOINTMENT OF SPECIAL PROCESS SERVER**

Comes now Plaintiff, pursuant to Local Court Rule 4.2.1 and at his/her/its own risk, requests the appointment of:  
 Eric Erger, AEGIS SECURITY GROUP, 370 S. Lowe Ave., Suite. A, Cookeville, TN 38501 931-260-3869

Name of Process Server	Address	Telephone
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Name of Process Server	Address	Telephone
------------------------	---------	-----------

a person(s) of lawful age to serve the summons and petition in this cause on the below named parties.  
 This appointment as special process server does not include the authorization to carry a concealed weapon in the performance thereof.

**SERVE:** Industrial Air Purification, Inc.  
 c/o Candyce Bradshaw, President  
 Name or Person in Charge  
 2551 Hidden Cove Rd.  
 Cookeville, TN 38506  
 Address

City/State/Zip

**SERVE:**  
 Donald Campbell a/k/a Don Campbell  
 Name  
 2551 Hidden Cove Rd.  
 Cookeville, TN 38506  
 Address

City/State/Zip

**Appointed as requested:****Judy Zerr, Circuit Clerk**

By \_\_\_\_\_  
 Deputy Clerk

Date \_\_\_\_\_

**IN THE MISSOURI CIRCUIT COURT  
FOR THE ELEVENTH JUDICIAL CIRCUIT  
COUNTY OF ST. CHARLES**

<b>CONNECTOR CASTINGS, INC.,</b>	)	
	)	
<b>Plaintiff,</b>	)	
	)	
<b>v.</b>	)	
	)	<b>No. 1611-CC00501</b>
<b>INDUSTRIAL AIR PURIFICATION,</b>	)	
<b>INC., DONALD CAMPBELL a/k/a</b>	)	<b>Div. 1</b>
<b>DON CAMPBELL, et al.,</b>	)	
	)	
<b>Defendants.</b>	)	

**PLAINTIFF'S REQUEST FOR ISSUANCE OF ALIAS SUMMONSES**

Plaintiff requests issuance of an alias summons to

Industrial Air Purification, Inc.  
c/o Candyce Bradshaw, President  
or Person in Charge  
2551 Hidden Cove Rd.  
Cookeville, TN 38506

Donald Campbell a/k/a Don Campbell  
2551 Hidden Cove Rd.  
Cookeville, TN 38506

Plaintiff will file a separate request for appointment of special process server.

SCHULTZ & ASSOCIATES LLP

By: /s/ Ronald J. Eisenberg  
Ronald J. Eisenberg, #48674  
Robert Schultz, #35329  
640 Cepi Drive, Suite A  
Chesterfield, MO 63005  
636-537-4645  
Fax: 636-537-2599  
[reisenberg@sl-lawyers.com](mailto:reisenberg@sl-lawyers.com)  
[rschultz@sl-lawyers.com](mailto:rschultz@sl-lawyers.com)  
*Attorneys for Plaintiff*

**CERTIFICATE OF SERVICE**

The above-signed certifies that this document was eFiled on October 13, 2016.






## IN THE 11TH JUDICIAL CIRCUIT COURT, ST. CHARLES COUNTY, MISSOURI

Judge or Division: TED HOUSE	Case Number: 1611-CC00501	(Date File Stamp)
Plaintiff/Petitioner: CONNECTOR CASTINGS INC	Plaintiff's/Petitioner's Attorney/Address: RONALD JAY EISENBERG 640 CEPI DRIVE SUITE A CHESTERFIELD, MO 63005	
Defendant/Respondent: INDUSTRIAL AIR PURIFICATION INC	Court Address: 300 N 2nd STREET SAINT CHARLES, MO 63301	
Nature of Suit: CC Other Miscellaneous Actions		

**Summons for Personal Service Outside the State of Missouri  
(Except Attachment Action)**

<p>The State of Missouri to: <b>INDUSTRIAL AIR PURIFICATION INC</b>  <b>Alias:</b>  <b>CANDYCE BRADSHAW PRESIDENT</b>  <b>OR PERSON IN CHARGE</b>  <b>2551 HIDDEN COVE RD</b>  <b>COOKEVILLE, TN 38506</b></p> <p><b>COURT SEAL OF</b>    <b>ST. CHARLES COUNTY</b></p>	<p>You are summoned to appear before this court and to file your pleading to the petition, copy of which is attached, and to serve a copy of your pleading upon the attorney for the Plaintiff/Petitioner at the above address all within 30 days after service of this summons upon you, exclusive of the day of service. If you fail to file your pleading, judgment by default will be taken against you for the relief demanded in this action.</p> <p align="center">October 14, 2016 Date</p> <p align="right">/S/JUDY ZERR Clerk</p>
--	---

**Officer's or Server's Affidavit of Service**

I certify that:

- I am authorized to serve process in civil actions within the state or territory where the above summons was served.
- My official title is \_\_\_\_\_ of \_\_\_\_\_ County, \_\_\_\_\_ (state).
- I have served the above summons by: (check one)
  - ☐ delivering a copy of the summons and a copy of the petition to the Defendant/Respondent.
  - ☐ leaving a copy of the summons and a copy of the petition at the dwelling place or usual abode of the Defendant/Respondent with \_\_\_\_\_, a person of the Defendant's/Respondent's family over the age of 15 years.
  - ☐ (for service on a corporation) delivering a copy of the summons and a copy of the petition to \_\_\_\_\_ (name) \_\_\_\_\_ (title).
  - ☐ other (describe) \_\_\_\_\_.

Served at \_\_\_\_\_ (address)  
 in \_\_\_\_\_ County, \_\_\_\_\_ (state), on \_\_\_\_\_ (date) at \_\_\_\_\_ (time).

Printed Name of Sheriff or Server

Signature of Sheriff or Server

Subscribed and Sworn To me before this \_\_\_\_\_ (day) \_\_\_\_\_ (month) \_\_\_\_\_ (year)

I am: (check one)

- ☐ the clerk of the court of which affiant is an officer.
- ☐ the judge of the court of which affiant is an officer.
- ☐ authorized to administer oaths in the state in which the affiant served the above summons. (use for out-of-state officer)
- ☐ authorized to administer oaths. (use for court-appointed server)

(Seal)

Signature and Title

**Service Fees, if applicable**

Summons \$ \_\_\_\_\_  
 Non Est \$ \_\_\_\_\_  
 Mileage \$ \_\_\_\_\_ (\_\_\_\_\_ miles @ \$ \_\_\_\_\_ per mile)  
 Total \$ \_\_\_\_\_

See the following page for directions to clerk and to officer making return on service of summons.

### **Directions to Clerk**

Personal service outside the State of Missouri is permitted only upon certain conditions set forth in Rule 54. The clerk should insert in the summons the names of only the Defendant/Respondent or Defendants/Respondents who are to be personally served by the officer to whom the summons is delivered. The summons should be signed by the clerk or deputy clerk under the seal of the court and a copy of the summons and a copy of the petition for each Defendant/Respondent should be mailed along with the original summons to the officer who is to make service. The copy of the summons may be a carbon or other copy and should be signed and sealed in the same manner as the original but it is unnecessary to certify that the copy is a true copy. The copy of the motion may be a carbon or other copy and should be securely attached to the copy of the summons but need not be certified a true copy. If the Plaintiff's/Petitioner has no attorney, the Plaintiff's/Petitioner's address and telephone number should be stated in the appropriate square on the summons. This form is not for use in attachment actions. (See Rule 54.06, 54.07 and 54.14)

### **Directions to Officer Making Return on Service of Summons**

A copy of the summons and a copy of the motion must be served on each Defendant/Respondent. If any Defendant/Respondent refuses to receive the copy of the summons and motion when offered, the return shall be prepared accordingly so as to show the offer of the officer to deliver the summons and motion and the Defendant's/Respondent's refusal to receive the same.

Service shall be made: (1) On Individual. On an individual, including an infant or incompetent person not having a legally appointed guardian, by delivering a copy of the summons and motion to the individual personally or by leaving a copy of the summons and motion at the individual's dwelling house or usual place of abode with some person of the family over 15 years of age, or by delivering a copy of the summons and petition to an agent authorized by appointment or required by law to receive service of process; (2) On Guardian. On an infant or incompetent person who has a legally appointed guardian, by delivering a copy of the summons and motion to the guardian personally; (3) On Corporation, Partnership or Other Unincorporated Association. On a corporation, partnership or unincorporated association, by delivering a copy of the summons and motion to an officer, partner, or managing or general agent, or by leaving the copies at any business office of the Defendant/Respondent with the person having charge thereof or by delivering copies to its registered agent or to any other agent authorized by appointment or required by law to receive service of process; (4) On Public or Quasi-Public Corporation or Body. Upon a public, municipal, governmental or quasi-public corporation or body in the case of a county, to the mayor or city clerk or city attorney in the case of a city, to the chief executive officer in the case of any public, municipal, governmental, or quasi-public corporation or body or to any person otherwise lawfully so designated.

Service may be made by an officer or deputy authorized by law to serve process in civil actions within the state or territory where such service is made.

Service may be made in any state or territory of the United States. If served in a territory, substitute the word "territory" for the word "state."

The officer making the service must swear an affidavit before the clerk, deputy clerk, or judge of the court of which the person is an officer or other person authorized to administer oaths. This affidavit must state the time, place, and manner of service, the official character of the affiant, and the affiant's authority to serve process in civil actions within the state or territory where service is made.


Service must not be made less than ten days nor more than 30 days from the date the Defendant/Respondent is to appear in court. The return should be made promptly and in any event so that it will reach the Missouri Court within 30 days after service.



## IN THE 11TH JUDICIAL CIRCUIT COURT, ST. CHARLES COUNTY, MISSOURI

Judge or Division: TED HOUSE	Case Number: 1611-CC00501	(Date File Stamp)
Plaintiff/Petitioner: CONNECTOR CASTINGS INC	Plaintiff's/Petitioner's Attorney/Address: RONALD JAY EISENBERG 640 CEPI DRIVE SUITE A CHESTERFIELD, MO 63005	
Defendant/Respondent: INDUSTRIAL AIR PURIFICATION INC	Court Address: 300 N 2nd STREET SAINT CHARLES, MO 63301	
Nature of Suit: CC Other Miscellaneous Actions		

**Summons for Personal Service Outside the State of Missouri  
(Except Attachment Action)**

<p>The State of Missouri to: <b>DONALD CAMPBELL</b> Alias: <b>DON CAMPBELL</b> 2551 HIDDEN COVE RD. COOKEVILLE, TN 38506</p>	
<p><b>COURT SEAL OF</b>  <b>ST. CHARLES COUNTY</b></p>	<p>You are summoned to appear before this court and to file your pleading to the petition, copy of which is attached, and to serve a copy of your pleading upon the attorney for the Plaintiff/Petitioner at the above address all within 30 days after service of this summons upon you, exclusive of the day of service. If you fail to file your pleading, judgment by default will be taken against you for the relief demanded in this action.</p> <p align="center">October 14, 2016 Date</p> <p align="right">/S/JUDY ZERR Clerk</p> <p>Further Information:</p>
<b>Officer's or Server's Affidavit of Service</b>	
<p>I certify that:</p> <p>1. I am authorized to serve process in civil actions within the state or territory where the above summons was served.</p> <p>2. My official title is _____ of _____ County, _____ (state).</p> <p>3. I have served the above summons by: (check one)</p> <p><input type="checkbox"/> delivering a copy of the summons and a copy of the petition to the Defendant/Respondent.</p> <p><input type="checkbox"/> leaving a copy of the summons and a copy of the petition at the dwelling place or usual abode of the Defendant/Respondent with _____, a person of the Defendant's/Respondent's family over the age of 15 years.</p> <p><input type="checkbox"/> (for service on a corporation) delivering a copy of the summons and a copy of the petition to _____ (name) _____ (title).</p> <p><input type="checkbox"/> other (describe) _____.</p> <p>Served at _____ (address) in _____ County, _____ (state), on _____ (date) at _____ (time).</p> <p>_____ Printed Name of Sheriff or Server</p> <p align="right">_____ Signature of Sheriff or Server</p> <p><b>Subscribed and Sworn To</b> me before this _____ (day) _____ (month) _____ (year)</p> <p>I am: (check one)</p> <p><input type="checkbox"/> the clerk of the court of which affiant is an officer.</p> <p><input type="checkbox"/> the judge of the court of which affiant is an officer.</p> <p><input type="checkbox"/> authorized to administer oaths in the state in which the affiant served the above summons. (use for out-of-state officer)</p> <p><input type="checkbox"/> authorized to administer oaths. (use for court-appointed server)</p> <p align="right">_____ Signature and Title</p>	
<p><b>Service Fees, if applicable</b></p> <p>Summons \$ _____</p> <p>Non Est \$ _____</p> <p>Mileage \$ _____ (_____ miles @ \$ _____ per mile)</p> <p><b>Total</b> \$ _____</p> <p align="center">See the following page for directions to clerk and to officer making return on service of summons.</p>	

### **Directions to Clerk**

Personal service outside the State of Missouri is permitted only upon certain conditions set forth in Rule 54. The clerk should insert in the summons the names of only the Defendant/Respondent or Defendants/Respondents who are to be personally served by the officer to whom the summons is delivered. The summons should be signed by the clerk or deputy clerk under the seal of the court and a copy of the summons and a copy of the petition for each Defendant/Respondent should be mailed along with the original summons to the officer who is to make service. The copy of the summons may be a carbon or other copy and should be signed and sealed in the same manner as the original but it is unnecessary to certify that the copy is a true copy. The copy of the motion may be a carbon or other copy and should be securely attached to the copy of the summons but need not be certified a true copy. If the Plaintiff's/Petitioner has no attorney, the Plaintiff's/Petitioner's address and telephone number should be stated in the appropriate square on the summons. This form is not for use in attachment actions. (See Rule 54.06, 54.07 and 54.14)

### **Directions to Officer Making Return on Service of Summons**

A copy of the summons and a copy of the motion must be served on each Defendant/Respondent. If any Defendant/Respondent refuses to receive the copy of the summons and motion when offered, the return shall be prepared accordingly so as to show the offer of the officer to deliver the summons and motion and the Defendant's/Respondent's refusal to receive the same.

Service shall be made: (1) On Individual. On an individual, including an infant or incompetent person not having a legally appointed guardian, by delivering a copy of the summons and motion to the individual personally or by leaving a copy of the summons and motion at the individual's dwelling house or usual place of abode with some person of the family over 15 years of age, or by delivering a copy of the summons and petition to an agent authorized by appointment or required by law to receive service of process; (2) On Guardian. On an infant or incompetent person who has a legally appointed guardian, by delivering a copy of the summons and motion to the guardian personally; (3) On Corporation, Partnership or Other Unincorporated Association. On a corporation, partnership or unincorporated association, by delivering a copy of the summons and motion to an officer, partner, or managing or general agent, or by leaving the copies at any business office of the Defendant/Respondent with the person having charge thereof or by delivering copies to its registered agent or to any other agent authorized by appointment or required by law to receive service of process; (4) On Public or Quasi-Public Corporation or Body. Upon a public, municipal, governmental or quasi-public corporation or body in the case of a county, to the mayor or city clerk or city attorney in the case of a city, to the chief executive officer in the case of any public, municipal, governmental, or quasi-public corporation or body or to any person otherwise lawfully so designated.

Service may be made by an officer or deputy authorized by law to serve process in civil actions within the state or territory where such service is made.

Service may be made in any state or territory of the United States. If served in a territory, substitute the word "territory" for the word "state."

The officer making the service must swear an affidavit before the clerk, deputy clerk, or judge of the court of which the person is an officer or other person authorized to administer oaths. This affidavit must state the time, place, and manner of service, the official character of the affiant, and the affiant's authority to serve process in civil actions within the state or territory where service is made.

Service must not be made less than ten days nor more than 30 days from the date the Defendant/Respondent is to appear in court. The return should be made promptly and in any event so that it will reach the Missouri Court within 30 days after service.

A copy of this Notice is to be provided by the Clerk of the Circuit Court to each of the parties initiating the suit at the time it is filed, and a copy is to be served on each other party in the suit with the summons and petition served on that party.

STATE OF MISSOURI )  
 ) ss.  
ST. CHARLES COUNTY, MISSOURI )

IN THE CIRCUIT COURT OF ST. CHARLES COUNTY, MISSOURI

\_\_\_\_\_  
Plaintiff(s), )  
 )  
vs. ) Cause # \_\_\_\_\_  
 )  
\_\_\_\_\_  
Defendant(s). )

**CONSENT TO MEDIATION FORM**

I, the undersigned counsel of record in this case, hereby certify that I have discussed the subject of mediation under the Court's Alternative Dispute Resolution Program with my client(s) in this case and that:

\_\_\_\_\_ We believe that mediation would be helpful in this case and consent to the referral of the case to mediation upon the filing of similar consents by all other parties in the case.

\_\_\_\_\_ We do not consent to the referral of this case to mediation.

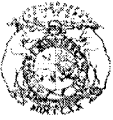
\_\_\_\_\_  
Signature

\_\_\_\_\_  
(Print Name)

Attorney for:

\_\_\_\_\_  
(Party or Parties)

Date: \_\_\_\_\_



## IN THE ELEVENTH JUDICIAL CIRCUIT, ST CHARLES COUNTY, MISSOURI

Judge or Division: 1	Case Number: 1611-CC00501
Plaintiff: CONNECTOR CASTINGS, INC.,	Defendant: INDUSTRIAL AIR PURIFICATION, INC., DONALD CAMPBELL a/k/a DON CAMPBELL, et al.,

(Date File Stamp)

## REQUEST FOR APPOINTMENT OF SPECIAL PROCESS SERVER

Comes now Plaintiff, pursuant to Local Court Rule 4.2.1 and at his/her/its own risk, requests the appointment of:

Eric Erger, AEGIS SECURITY GROUP, 370 S. Lowe Ave., Suite. A, Cookeville, TN 38501 931-260-3869

Name of Process Server	Address	Telephone
------------------------	---------	-----------

Name of Process Server	Address	Telephone
------------------------	---------	-----------

a person(s) of lawful age to serve the summons and petition in this cause on the below named parties.

This appointment as special process server does not include the authorization to carry a concealed weapon in the performance thereof.

**SERVE:** Industrial Air Purification, Inc.  
c/o Candyce Bradshaw, President  
Name or Person in Charge  
2551 Hidden Cove Rd.  
Cookeville, TN 38506  
Address

City/State/Zip

**SERVE:**  
Donald Campbell a/k/a Don Campbell  
Name 2551 Hidden Cove Rd.  
Cookeville, TN 38506  
Address

City/State/Zip

ALL RISKS TO PLAINTIFF

SO APPOINTED:

DATE: OCT 14 2016

Appointed as requested:

Judy Zerr, Circuit Clerk

by *Carol Dupiano*  
JUDY ZERR, CIRCUIT CLERK

By \_\_\_\_\_

Date \_\_\_\_\_

Deputy Clerk





## IN THE 11TH JUDICIAL CIRCUIT COURT, ST. CHARLES COUNTY, MISSOURI

Judge or Division: TED HOUSE	Case Number: 1611-CC00501
Plaintiff/Petitioner: CONNECTOR CASTINGS INC	Plaintiff's/Petitioner's Attorney/Address: RONALD JAY EISENBERG 640 CEPI DRIVE SUITE A CHESTERFIELD, MO 63005
Defendant/Respondent: INDUSTRIAL AIR PURIFICATION INC	Court Address: 300 N 2nd STREET SAINT CHARLES, MO 63301
Nature of Suit: CC Other Miscellaneous Actions	(Date File Stamp)

## Summons for Personal Service Outside the State of Missouri

(Except Attachment Action)

The State of Missouri to: DONALD CAMPBELL  
Alias: DON CAMPBELL

2551 HIDDEN COVE RD.  
COOKEVILLE, TN 38506

**COURT SEAL OF**  
  
ST. CHARLES COUNTY

You are summoned to appear before this court and to file your pleading to the petition, copy of which is attached, and to serve a copy of your pleading upon the attorney for the Plaintiff/Petitioner at the above address all within 30 days after service of this summons upon you, exclusive of the day of service. If you fail to file your pleading, judgment by default will be taken against you for the relief demanded in this action.

October 14, 2016  
Date

/S/JUDY ZERR  
Clerk

Further Information:

## Officer's or Server's Affidavit of Service

I certify that:

- I am authorized to serve process in civil actions within the state or territory where the above summons was served.
- My official title is Private Process Server of Putnam County, TN (state).
- I have served the above summons by: (check one)

- ☒ delivering a copy of the summons and a copy of the petition to the Defendant/Respondent.
- ☐ leaving a copy of the summons and a copy of the petition at the dwelling place or usual abode of the Defendant/Respondent with \_\_\_\_\_, a person of the Defendant's/Respondent's family over the age of 15 years.
- ☐ (for service on a corporation) delivering a copy of the summons and a copy of the petition to \_\_\_\_\_ (name) \_\_\_\_\_ (title).
- ☐ other (describe) \_\_\_\_\_ (address)

Served at 2550 Hwy 70 E Cookeville, TN 38506 (address)  
in Putnam County, TN (state), on 10/17/16 (date) at 08:47 (time).

Printed Name of Sheriff or Server

Signature of Sheriff or Server

Subscribed and Sworn To me before this 17th (day) October (month) 2016 (year)

I am: (check one)

- ☐ the clerk of the court of which affiant is an officer.
- ☐ the judge of the court of which affiant is an officer.
- ☐ authorized to administer oaths in the state in which the affiant served the above summons. (use for out-of-state officer)
- ☒ authorized to administer oaths. (use for court-appointed server)

Jim Muehlbauer, Notary  
Signature and Title

## Service Fees, if applicable

Summons \$ \_\_\_\_\_

Non Est \$ \_\_\_\_\_

Mileage \$ \_\_\_\_\_ ( \_\_\_\_\_ miles @ \$ \_\_\_\_\_ per mile)

Total \$ \_\_\_\_\_

See the following page for directions to clerk and to officer making return on service of summons.







## IN THE 11TH JUDICIAL CIRCUIT COURT, ST. CHARLES COUNTY, MISSOURI

Judge or Division: TED HOUSE	Case Number: 1611-CC00501	(Date File Stamp)
Plaintiff/Petitioner: CONNECTOR CASTINGS INC	Plaintiff's/Petitioner's Attorney/Address: RONALD JAY EISENBERG 640 CEPI DRIVE SUITE A CHESTERFIELD, MO 63005	
Defendant/Respondent: INDUSTRIAL AIR PURIFICATION INC	Court Address: 300 N 2nd STREET SAINT CHARLES, MO 63301	
Nature of Suit: CC Other Miscellaneous Actions		

### Summons for Personal Service Outside the State of Missouri (Except Attachment Action)

The State of Missouri to: <b>INDUSTRIAL AIR PURIFICATION INC</b> Alias: <b>CANDYCE BRADSHAW PRESIDENT</b> <b>OR PERSON IN CHARGE</b> <b>2551 HIDDEN COVE RD</b> <b>COOKEVILLE, TN 38506</b>	
	You are summoned to appear before this court and to file your pleading to the petition, copy of which is attached, and to serve a copy of your pleading upon the attorney for the Plaintiff/Petitioner at the above address all within 30 days after service of this summons upon you, exclusive of the day of service. If you fail to file your pleading, judgment by default will be taken against you for the relief demanded in this action.
October 14, 2016 Date	/S/JUDY ZERR Clerk
Further Information:	

### Officer's or Server's Affidavit of Service

I certify that:

- I am authorized to serve process in civil actions within the state or territory where the above summons was served.
- My official title is Private Process Server of Putnam County, TN (state).
- I have served the above summons by: (check one)
  - ☒ delivering a copy of the summons and a copy of the petition to the Defendant/Respondent.
  - ☐ leaving a copy of the summons and a copy of the petition at the dwelling place or usual abode of the Defendant/Respondent with \_\_\_\_\_, a person of the Defendant's/Respondent's family over the age of 15 years.
  - ☐ (for service on a corporation) delivering a copy of the summons and a copy of the petition to \_\_\_\_\_ (name) \_\_\_\_\_ (title).
  - ☐ other (describe) \_\_\_\_\_

Served at 2475 Hidden Cove Rd Cookeville, TN 38506 (address)  
 in Putnam County, TN (state), on 10/12/16 (date) at 08:59 (time).  
Eric Erger Printed Name of Sheriff or Server  
[Signature] Signature of Sheriff or Server

Subscribed and Sworn To me before this 17th (day) October (month) 2016 (year)  
 I am: (check one) ☐ the clerk of the court of which affiant is an officer.  
☐ the judge of the court of which affiant is an officer.  
☐ authorized to administer oaths in the state in which the affiant served the above summons. (use for out-of-state officer)  
☒ authorized to administer oaths. (use for court-appointed server)

Jeri McWilliams, Notary  
 Signature and Title

### Service Fees, if applicable

Summons \$ \_\_\_\_\_  
 Non Est \$ \_\_\_\_\_  
 Mileage \$ \_\_\_\_\_ ( \_\_\_\_\_ miles @ \$ \_\_\_\_\_ per mile)  
 Total \$ \_\_\_\_\_

See the following page for directions to clerk and to officer making return on service of summons.




## IN THE 11TH JUDICIAL CIRCUIT COURT, ST. CHARLES COUNTY, MISSOURI

Judge or Division: TED HOUSE	Case Number: 1611-CC00501
Plaintiff/Petitioner: CONNECTOR CASTINGS INC	Plaintiff's/Petitioner's Attorney/Address: RONALD JAY EISENBERG 640 CEPI DRIVE SUITE A CHESTERFIELD, MO 63005
Defendant/Respondent: INDUSTRIAL AIR PURIFICATION INC	Court Address: 300 N 2nd STREET SAINT CHARLES, MO 63301
Nature of Suit: CC Other Miscellaneous Actions	(Date File Stamp)

**Summons for Personal Service Outside the State of Missouri**  
(Except Attachment Action)

The State of Missouri to: DONALD CAMPBELL  
Alias: DON CAMPBELL

2551 HIDDEN COVE RD.  
COOKEVILLE, TN 38506

**COURT SEAL OF**  
  
ST. CHARLES COUNTY

You are summoned to appear before this court and to file your pleading to the petition, copy of which is attached, and to serve a copy of your pleading upon the attorney for the Plaintiff/Petitioner at the above address all within 30 days after service of this summons upon you, exclusive of the day of service. If you fail to file your pleading, judgment by default will be taken against you for the relief demanded in this action.

October 14, 2016  
Date

/S/JUDY ZERR  
Clerk

Further Information:

**Officer's or Server's Affidavit of Service**

I certify that:

- I am authorized to serve process in civil actions within the state or territory where the above summons was served.
- My official title is Private Process Server of Putnam County, TN (state).
- I have served the above summons by: (check one)

- ☒ delivering a copy of the summons and a copy of the petition to the Defendant/Respondent.
- ☐ leaving a copy of the summons and a copy of the petition at the dwelling place or usual abode of the Defendant/Respondent with \_\_\_\_\_, a person of the Defendant's/Respondent's family over the age of 15 years.
- ☐ (for service on a corporation) delivering a copy of the summons and a copy of the petition to \_\_\_\_\_ (name) \_\_\_\_\_ (title).
- ☐ other (describe) \_\_\_\_\_

Served at 2550 Hwy 70 E Cookeville, TN 38506 (address)  
in Putnam County, TN (state), on 10/17/16 (date) at 08:47 (time).

Printed Name of Sheriff or Server

Signature of Sheriff or Server

Subscribed and Sworn To me before this 17th (day) October (month) 2016 (year)

- I am: (check one)
- ☐ the clerk of the court of which affiant is an officer.
- ☐ the judge of the court of which affiant is an officer.
- ☐ authorized to administer oaths in the state in which the affiant served the above summons. (use for out-of-state officer)
- ☒ authorized to administer oaths. (use for court-appointed server)

Signature and Title

## Service Fees, if applicable

Summons \$ \_\_\_\_\_

Non Est \$ \_\_\_\_\_

Mileage \$ \_\_\_\_\_ ( \_\_\_\_\_ miles @ \$ \_\_\_\_\_ per mile)

Total \$ \_\_\_\_\_

See the following page for directions to clerk and to officer making return on service of summons.






## IN THE 11TH JUDICIAL CIRCUIT COURT, ST. CHARLES COUNTY, MISSOURI

Judge or Division: TED HOUSE	Case Number: 1611-CC00501
Plaintiff/Petitioner: CONNECTOR CASTINGS INC	Plaintiff's/Petitioner's Attorney/Address: RONALD JAY EISENBERG 640 CEPI DRIVE SUITE A CHESTERFIELD, MO 63005
Defendant/Respondent: INDUSTRIAL AIR PURIFICATION INC	Court Address: 300 N 2nd STREET SAINT CHARLES, MO 63301
Nature of Suit: CC Other Miscellaneous Actions	(Date File Stamp)

**Summons for Personal Service Outside the State of Missouri**  
(Except Attachment Action)

<p>The State of Missouri to: <b>INDUSTRIAL AIR PURIFICATION INC</b> Alias: CANDYCE BRADSHAW PRESIDENT OR PERSON IN CHARGE 2551 HIDDEN COVE RD COOKEVILLE, TN 38506</p> <p><b>COURT SEAL OF</b>  <b>ST. CHARLES COUNTY</b></p>	<p>You are summoned to appear before this court and to file your pleading to the petition, copy of which is attached, and to serve a copy of your pleading upon the attorney for the Plaintiff/Petitioner at the above address all within 30 days after service of this summons upon you, exclusive of the day of service. If you fail to file your pleading, judgment by default will be taken against you for the relief demanded in this action.</p> <p align="center">October 14, 2016 Date</p> <p align="right">/S/JUDY ZERR Clerk</p>
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**Officer's or Server's Affidavit of Service**

I certify that:

- I am authorized to serve process in civil actions within the state or territory where the above summons was served.
- My official title is Private Process Server of Putnam County, TN (state).
- I have served the above summons by: (check one)
  - ☒ delivering a copy of the summons and a copy of the petition to the Defendant/Respondent.
  - ☐ leaving a copy of the summons and a copy of the petition at the dwelling place or usual abode of the Defendant/Respondent with \_\_\_\_\_, a person of the Defendant's/Respondent's family over the age of 15 years.
  - ☐ (for service on a corporation) delivering a copy of the summons and a copy of the petition to \_\_\_\_\_ (name) \_\_\_\_\_ (title).
  - ☐ other (describe) \_\_\_\_\_

Served at 2475 Hidden Cove Rd Cookeville, TN 38506 (address)  
in Putnam County, TN (state), on 10/12/16 (date) at 08:59 (time).  
Printed Name of Sheriff or Server Eric Erger Signature of Sheriff or Server [Signature]

**Subscribed and Sworn** To me before this 17th (day) October (month) 2016 (year)  
I am: (check one) ☐ the clerk of the court of which affiant is an officer.  
☐ the judge of the court of which affiant is an officer.  
☐ authorized to administer oaths in the state in which the affiant served the above summons. (use for out-of-state officer)  
☒ authorized to administer oaths. (use for court-appointed server)

Jeri McWilliams, Notary  
Signature and Title

**Service Fees, if applicable**  
Summons \$ \_\_\_\_\_  
Non Est \$ \_\_\_\_\_  
Mileage \$ \_\_\_\_\_ ( \_\_\_\_\_ miles @ \$ \_\_\_\_\_ per mile)  
Total \$ \_\_\_\_\_

See the following page for directions to clerk and to officer making return on service of summons.

**IN THE MISSOURI CIRCUIT COURT  
FOR THE ELEVENTH JUDICIAL CIRCUIT  
COUNTY OF ST. CHARLES**

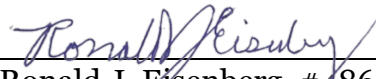
<b>CONNECTOR CASTINGS, INC.,</b>	)	
	)	
<b>Plaintiff,</b>	)	
	)	
<b>v.</b>	)	
	)	<b>No. 1611-CC00501</b>
<b>INDUSTRIAL AIR PURIFICATION,</b>	)	
<b>INC., DONALD CAMPBELL a/k/a</b>	)	<b>Div. 1</b>
<b>DON CAMPBELL, et al.,</b>	)	
	)	
<b>Defendants.</b>	)	

**CERTIFICATE OF SERVICE**

The undersigned counsel for Plaintiff certifies that on October 18, 2016, (a) PLAINTIFF'S FIRST SET OF INTERROGATORIES TO DEFENDANT DONALD CAMPBELL a/k/a DON CAMPBELL, (b) PLAINTIFF'S FIRST REQUESTS FOR PRODUCTION OF DOCUMENTS DIRECTED TO DEFENDANT CAMPBELL, (c) PLAINTIFF'S FIRST SET OF INTERROGATORIES TO DEFENDANT INDUSTRIAL AIR PURIFICATION, INC., (d) PLAINTIFF'S FIRST REQUESTS FOR PRODUCTION OF DOCUMENTS DIRECTED TO DEFENDANT INDUSTRIAL AIR PURIFICATION, INC., and (e) this Certificate of Service were served by U.S. Mail to the parties at the addresses below, including with CD ROMs containing Word versions the discovery requests, and this Certificate of Service was additionally eFiled:

<b>Candyce Bradshaw</b> <b>President</b> <b>Industrial Air Purification, Inc.</b> <b>2475 Hidden Cove Rd.</b> <b>Cookeville, TN 38506</b>  <i>Defendant</i>	<b>Donald Campbell</b> <b>a/k/a Don Campbell</b> <b>2550 Hwy 70 E.</b> <b>Cookeville, TN 38506</b>  <i>Defendant</i>
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SCHULTZ & ASSOCIATES LLP

By:   
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*Attorney for Plaintiff*